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March 3, 2022

HON. STEWART D. AARON
United States Magistrate Judge
United States District Court
500 North Pearl Street, Room 2260
New York, NY 10007

Re: United States of America and States of the United States, ex rel.
Donoghue v. Richard Carranza, et al., No. 1:20-cv-5396 (GWH)(SDH)

Dear Magistrate Judge Aaron:

I am counsel for the Defendants Buffalo Public School District and Kriner Cash, in his official capacity as Superintendent, in the above action. I was just recently granted admission pro hac vice, on Wednesday, March 3, 2022.

Pursuant to Rule 1.E of Your Honor's Individual Rules for Practice for Civil Cases, I submit this letter to request an extension of time, to April 15, 2022, for Buffalo Public School District and Kriner Cash to answer or respond to Plaintiffs' Second Amended Complaint (Doc. 19). The answer or response is currently due on March 3, 2022. The reason for this request is to allow counsel to evaluate the Second Amended Complaint with their clients.

There have been no prior requests for extension of time and Counsel for Realtor has consented to this extension. Please contact my direct extension, (716) 816-3101, should there be any questions.

Respectfully yours,

NATHANIEL KUZMA, ESQ.
General Counsel

/s/ Robert E. Quinn

By: Robert E. Quinn
Assistant Legal Counsel

CC: All Counsel (by ECF)